

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
ALEXANDRIA DIVISION**

IN RE:	)	
	)	
PATRICK ROCH,	)	Case No. 19-11944-BFK
	)	
Debtor.	)	Chapter 13
_____	)	

**DEBTOR’S MOTION TO INCUR POST-PETITION INDEBTEDNESS**

COMES NOW, Patrick Roch (the “Debtor”), by counsel, and moves this Court to approve the purchase and financing by the Debtor of a used 2016 Volkswagen Passat 4dr Sedan.

In support of this Motion, the Debtor asserts as follows:

1. The bankruptcy case of the above Debtor is pending under Chapter 13 of the United States Bankruptcy Code and was filed on June 12, 2019.
2. The Chapter 13 plan was confirmed on August 30, 2019.
3. The event precipitating the Debtor’s need to incur debt was an increase of the Debtor’s weekly auto lease payment to GM financial from approximately \$140.00 to approximately \$379.00.
4. The Debtor needs to replace a 2017 Chevrolet Cruze being paid directly by the debtor at the rate of \$379.00 per week.
5. The Debtor proposed to purchase a used vehicle from DriveTime in Woodbridge, VA, who is not related to the Debtor, for the sum of \$13,095, with interest at the rate of 24.201% per annum. The monthly payment will be \$463.12. The Debtor will return currently leased vehicle paid weekly at \$379.00.

6. The Debtor is current on the Chapter 13 plan payments and this purchase will not adversely impact the Chapter 13 plan because the monthly payments for the purchased vehicle will be significantly lower than the recently increased lease payments.
7. The Debtor believes that the purchase of this property is necessary because he generates his income driving for Uber and Lyft and he cannot afford to continue paying the increased lease payments while also repaying his creditors through the Chapter 13 plan.

WHEREFORE, the Debtor respectfully requests that the Court approve the purchase described herein upon negative notice to the creditor body.

Date: September 11, 2019

Respectfully Submitted,

AP LAW GROUP, PLC

/s/ Ashvin Pandurangi

Ashvin Pandurangi, Bar #86966

AP Law Group, PLC

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Falls Church, VA 22046

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*Counsel for Debtor*

#### **CERTIFICATE OF SERVICE**

I hereby certify that on the 11th day of September, 2019, a true copy of the foregoing Motion to Incur Post-Petition Indebtedness was served via ECF on the Chapter 13 Trustee and first class mail, postage prepaid to the attached list of creditors.

/s/ Ashvin Pandurangi

Ashvin Pandurangi, Bar #86966

Affirm Inc  
Affirm Incorporated  
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Suite 700  
Fairfax, VA 22030

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Correspondence/Bankruptcy  
Po Box 981540  
El Paso, TX 79998

Bank of America attn: BK Dept  
475 Cross Point Pkwy  
PO Box 9000  
Getzville, NY 14068

Barclays Bank Delaware  
Attn: Correspondence  
Po Box 8801  
Wilmington, DE 19899

Bmw Financial Services  
Attn: Bankruptcy Department  
Po Box 3608  
Dublin, OH 43016

Capital One  
P.O. Box 30285  
Salt Lake City, UT 84130

Chase Card Services  
Correspondence Dept  
Po Box 15298  
Wilmington, DE 19850

Fifth Third Bank  
PO Box 630412  
Cincinnati, OH 45263

GM Financial  
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